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ATTORNEY FOR PLAINTIFFS

**UNITED STATES DISTRICT COURT
FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

Thomas Roman, Caanan Himes, Chasity
Muse-Palumbo, Dwayne Pugh, Sergio
Mercado, Shawn Lenahan, Alejandro
Montoya, Lavern Robinson, Jason Wallace,
Jamiel Frazier, Ronald Sayles &
Martha Morse,

Plaintiffs,

vs.

COMMONWEALTH FINANCIAL
SYSTEMS, INC.,

Defendant.

Case No.: 3:15-cv-00211-RDM

**CERTIFICATION IN SUPPORT OF
CLERK DEFAULT**

Megan Kerrigan, Esq., hereby certifies as follows:

1. I am an attorney at law in the State of Pennsylvania and counsel to the firm, Law Offices of Michael Lupolover, P.C., attorneys for Plaintiffs, Thomas Roman, Caanan Himes, Chasity Muse-Palumbo, Dwayne Pugh, Sergio Mercado, Shawn Lenahan, Alejandro Montoya, Lavern Robinson, Jason Wallace, Jamiel Frazier, Ronald Sayles & Martha Morse, in the above-captioned litigation. As such, I am familiar with all of the facts set forth below.
2. I submit this Certification in support of Plaintiffs' request for the entry of default against Defendant COMMONWEALTH FINANCIAL SYSTEMS, INC., pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.
3. This action was commenced on or about, January 28, 2015, when Plaintiffs filed a Complaint against Defendant. See Document Entry No. 1. The complaint was served on

Defendant COMMONWEALTH FINANCIAL SYSTEMS, INC., on February 5, 2015.
See Document Entry No. 5.

4. More than twenty-one (21) days have elapsed since the date on which service of the Summons and Complaint was effective.
5. Neither Plaintiffs, nor the Court, has granted Defendant any extension of time to respond to the Complaint.
6. Defendant has failed to answer or otherwise respond to the Complaint, or serve a copy of any answer or other response upon Plaintiffs' attorneys of record.
7. Defendant is a corporation, and thus is not an infant, in the military, or an incompetent person.
8. Based on the above, Plaintiffs respectfully request that default be entered against Defendant.

CERTIFICATION

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true.

Dated: March 11, 2015

Respectfully Submitted,

/s/ Megan Kerrigan
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